Anh Nguyen

To: NCIC HPV@EPA

12/01/03 06:22 AM

Subject: HPV submission - CAS# 298-06-6

----- Forwarded by Anh Nguyen/DC/USEPA/US on 12/01/2003 06:20 AM -----



Cynthia Graham <cynthia.graham@bayerpolymers.com> on 11/26/2003 03:06:44 PM

To:

"Oppt.ncic" < Oppt.ncic@epa.gov>, Chem.rtk/

cc:

Richard Hefter/DC/USEPA/US@EPA, Oscar Hernandez/DC/USEPA/US@EPA, Patrick Ragan

Hoffman/DC/USEPA/US@EPA

Subject:

HPV submission - CAS# 298-06-6

OPPT CBIC

Attached please find the

Cover letter (298066_cvr ltr.pdf), Test plan (298066 test plan.pdf), and IUCLID document (298066_IUCLID.pdf)

on 0.0-diethyl dithiophosphate (CAS# 298-06-6) for submission to the US EPA HPV

Challenge Program.

(See attached file: 298066_IUCLID.pdf)(See attached file: 298066_cvr ltr.pdf)(See attached file: 298066 test plan.pdf)

Best regards / Mit freundlichen Grüßen,

Cynthia Graham, Ph.D.

Bayer Polymers LLC

Product Safety & Regulatory Affairs

100 Bayer Road, Building #5

Pittsburgh, PA 15205-9741

Phone: 412-777-3933 Fax: 412-777-7484



Email: cynthia.graham@bayerpolymers.com 298066_IUCLID.pdf 298066_cvr ltr.pd

298066 test plan.pc

Bayer Corporation 100 Bayer Road Pittsburgh, PA 15205-9741 Phone: 412 777-2000

November 26, 2003

Honorable Marianne Lamont Horinko Acting Administrator U.S. Environmental Protection Agency c/o P.O. Box 1473 Merrifield, VA 22116 OPPT CBIC

Attn:

Chemical Right-to-Know Program

Re:

HPV Registration No.

Dear Administrator Horinko;

Bayer CropScience LP is pleased to submit the proposed test plan along with the robust summaries in IUCLID format for O,O-diethyl dithiophosphate (CAS# 298-06-6). A separate letter is included to describe the process and transport of this substance to request "closed-system intermediate" status. The letter explaining intermediate status should remain confidential and should not be posted on the website.

Cynthia Graham, Ph.D. is our technical contact and can be reached at 412-777-3933 or by email at cynthia.graham@bayerpolymers.com

This submission is also being sent electronically to the following e-mail addresses: Oppt.ncic@epa.gov; Chem.rtk@epa.gov.

Sincerely,

Janet M. Mostowy, Ph.D. Vice President Product Safety & Regulatory Affairs

Enclosures:

Test Plan; IUCLID data set on CAS# 56-93-9; Request for closed-system intermediate" status

cc: Rich Hefter, EPA

Karen Hoffman, EPA
Oscar Hernandez, EPA
Pat Ragan, Bayer CropScience
Greg Moerer, Bayer CropScience

O,O-Diethyl dithiophosphate

CAS # 298-06-6

OPPT CBIC

Test plan

Bayer CropScience LP

November 26, 2003

Executive Summary

Bayer CropScience LP (Bayer) hereby submits for review and public comment their test plan for O,O-diethyl dithiophosphate (CAS# 298-06-6) under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program.

IUPAC Name	Common Name	<u>Abbreviation</u>	CAS#
O,O-diethyl dithiophosphate	diethyl acid	DEA	298-06-6

O,O-diethyl dithiophosphate is used as an intermediate in the production of an agricultural insecticide.

In consideration of animal welfare concerns to minimize the use of animals in the testing of chemicals, Bayer has conducted a thorough literature search for all available data, published and unpublished. Bayer has also performed an analysis of the adequacy of the existing data. Existing data indicates that this chemical is of high concern for aquatic toxicity, low concern as Persistent Organic Pollutants (POP), moderate concern for skin irritation, and low concern for acute mammalian toxicity. In a separate submission, Bayer has explained in detail that this substance is a closed-system intermediate and therefore a reduced data set is required. To fulfill the SIDS data set, an "in vitro Mammalian Cytogenetic Test" (OECD 473) and Teratogenicity study (OECD 414) on DEA is proposed for purposes of the HPV Program.

Closed System Intermediate Chemical Status

A separate document is being submitted to EPA to describe the process, sites, and transport of DEA to explain "closed-system" intermediate status. This information is considered Confidential and therefore is not available to the public in this document.

Data Review

Physicochemical properties:

The properties of DEA can be found in various online databases and some endpoints were calculated with EPIWin Modeling Program. DEA is a liquid at ambient temperatures and decomposes before boiling. The calculated octanol/water partition coefficient is 1.17 and only the salt form is soluble in water. Data is available for all endpoints, no additional testing is proposed for purposes of the HPV Program (See Table 1 and IUCLID document).

Environmental Fate:

Photodegradation was calculated as a half-life of 1.4 hours for DEA. Fugacity modeling demonstrates partitioning to the soil and water compartments. Biodegradation modeling demonstrates that DEA is biodegradable. In addition, a well documented study on various thiophosphates indicated complete mineralization within three weeks by acclimation. A water stability study demonstrated the nature of hydrolysis involves the attack of water molecule on the phosphorus of the di-ester involving P-O bond fission. Data is available for all endpoints, no additional testing is proposed for purposes of the HPV Program (See Table 1 and IUCLID document).

Ecotoxicology:

Aquatic studies have been performed on Salmo gairdineri, Poecilia reticulata and on Daphnia magna. The 24 hour LC50 of Daphnia magna = 0.54 mg/l (highly toxic). There are no studies on algae, however since DEA is highly toxic to Daphnia, additional testing on algae will not provide useful or relevant data for risk assessment. No additional testing is proposed for purposes of the HPV Program (See Table 1 and IUCLID document).

Mammalian Toxicology:

Toxicity studies in animals show that DEA is of low acute toxicity by all routes of exposure: oral LD₅₀ 4510 mg/kg (rat); inhalation LC₅₀ 1640 mg/m³ (rat); and dermal LD₅₀ > 2000 mg/kg (rabbit). (See Table 1 and IUCLID document).

There is an Ames study on DEA to fill the mutagenicity endpoint. No studies on chromosome aberration were located. An "in vitro Mammalian Cytogenetic Test" (OECD 473) on DEA is proposed for purposes of the HPV Program (See Table 1 and IUCLID document).

There were no repeat dose, fertility, nor developmental studies found. Since DEA is a closed system intermediate, the repeat dose and fertility studies are waived. A "Teratogenicity" study (OECD 414) on DEA is proposed for purposes of the HPV Program. (See Table 1 and IUCLID document).

"Beyond SIDS" Endpoints:

Studies have been performed to investigate skin and eye irritation on DEA and found to be irritating to the skin and eyes of rabbits. (See Table 2 and IUCLID document).

Exposure:

Since DEA is a closed-system intermediate, potential for exposure is minimal. Occupational exposure is controlled by good industrial hygiene practices and engineering controls. Environmental releases are controlled/prevented by engineering controls and careful monitoring. DEA is not present in the finished product, therefore there are no potential downstream exposures. DEA is not expected to pose a risk to human health or the environment during manufacture, formulation, and under normal conditions of anticipated use, if the recommended safe use and handling procedures are followed.

Conclusion

Existing data indicates that this chemical is of high concern for aquatic toxicity, low concern as Persistent Organic Pollutants (POP), moderate concern for skin irritation, and low concern for acute mammalian toxicity. In a separate submission, Bayer has explained in detail that DEA is a closed-system intermediate and therefore a reduced data set is required. To fulfill the SIDS data set, an "in vitro Mammalian Cytogenetic Test" (OECD 473) and Teratogenicity study (OECD 414) on DEA is proposed for purposes of the HPV Program.

Table 1. Available data for DEA

Endpoint	DEA (CAS# 298-06-6)				
Physical-Chemical Data					
Molecular weight	186.23				
Physical state	liquid				
Melting Point	Not applicable				
Boiling Point	105-108 °C @ 20 hPa				
Vapour Pressure	.077 hPa @ 25 °C				
Partition Coefficient (logPow)	1.17				
Water Solubility	insoluble				
Environm	nental Fate				
Photodegradation	T ½ = 1.4 hours				
Fugacity (distribution)	Air – 1.06 % Water – 39.5% Soil – 59.3% Sediment – 0.152%				
Biodegradability	Inherently biodegradable				
Water Stability	See IUCLID document				
Ecotox	ricology				
Acute Fish Toxicity 96 hrs LC ₅₀	Salmo gairdineri 310-330 mg/l Poecilia reticulata 79 mg/l (24 hours)				
Acute Invertebrate Toxicity 24 hrs LC ₅₀	Daphnia magna 0.54 mg/l				
Algal Toxicity 96 hrs LC ₅₀	No data				
Mammaliar	Toxicology				
Acute Toxicity	Oral LD ₅₀ = 4510 mg/kg (rat) Inhalation LC ₅₀ = 1640 mg/m3 (rat) Dermal LD ₅₀ >2000 mg/kg (rabbit)				
Mutagenicity	Ames (± activation) = negative				
Chromosome Aberration	No data				
Repeated Dose Toxicity	No data				
Reproductive Toxicity	No data				
Developmental Toxicity	No data				

^{*} Robust summaries and References can be found in the IUCLID document.

Table 2. "Beyond SIDS" data for DEA

Endpoint	DEA
	(CAS# 298-06-6)
Skin Irritation	Slightly irritating (24 hrs, rabbit)
Eye Irritation	Highly irritating (24 hrs, rabbit)

^{*} Robust summaries and References can be found in the IUCLID document.

Table 3. Test Plan for DEA

Endpoint	Data Availability	Acceptable	Planned testing
	Physical-Chemical Data	<u>:</u>	
Melting Point	✓	_	
Boiling Point	✓	1	
Vapour Pressure	✓	✓	
Partition Coefficient (logPow)	√	✓	
Water Solubility	√	✓	
	Environmental Fate	<u> </u>	
Photodegradation	√	/	
Fugacity	√	✓	
Biodegradability	✓	1	
Water Stability	✓	✓	
	Ecotoxicology	<u> </u>	Į.
Acute Fish Toxicity	✓	✓	
Acute Invertebrate Toxicity	✓	✓	
Algal Toxicity			Derogation statement
	Mammalian Toxicology		
Acute Toxicity	✓	✓	
Mutagenicity	√	1	
Chromosome Aberration			OECD 473
Repeated Dose Toxicity	Not required 'Closed system intermediate'		
Reproductive Toxicity	Not required 'Closed system intermediate'		
Developmental Toxicity			OECD 414

^{✓ =} data available and considered adequate.

IUCLID

Data Set

Existing Chemical

CAS No.

EINECS Name

EC No.

Molecular Formula

: ID: 298-06-6

: 298-06-6

: O,O-diethyl hydrogen phosphorodithioate

: 206-055-9 : C4H11O2PS2

Producer related part

Company Creation date : Bayer Corporation

: 08.11.2002

Substance related part

Company

: Bayer Corporation

Creation date

: 08.11.2002

Status

Memo

Bayer CropScience LP - US EPA HPV submission

Printing date

26.11.2003

Revision date

Date of last update

: 26.11.2003

Number of pages

: 25

Chapter (profile) Reliability (profile)

: Chapter: 1, 2, 3, 4, 5, 6, 7, 8, 10 : Reliability: without reliability, 1, 2, 3, 4

Flags (profile)

: Flags: without flag, confidential, non confidential, WGK (DE), TA-Luft (DE), Material Safety Dataset, Risk Assessment, Directive 67/548/EEC, SIDS

1. General Information

Id 298-06-6 **Date** 26.11.2003

1.0.1 APPLICANT AND COMPANY INFORMATION

Type importer of product Name **Bayer Corporation**

Contact person

Date

Street : 100 Bayer Road, Building #5 PA 15205-9741 Pittsburgh Town

United States Country

Phone Telefax Telex Cedex **Email** Homepage

13.11.2003

1.0.2 LOCATION OF PRODUCTION SITE, IMPORTER OR FORMULATOR

1.0.3 IDENTITY OF RECIPIENTS

1.0.4 DETAILS ON CATEGORY/TEMPLATE

1.1.0 SUBSTANCE IDENTIFICATION

: Phosphorodithioic acid, O,O-diethyl ester

Smiles Code : O(P(OCC)(S)=S)C

Molecular formula : C4 H11 O2 P1 S2

Molecular weight : 186.23

Petrol class : O(P(OCC)(S)=S)CC

Petrol class

08.10.2003

1.1.1 GENERAL SUBSTANCE INFORMATION

Purity type : typical for marketed substance

Substance type organic Physical status liquid

Purity

Colour colorless to blue-green

Odour

Source : Merck KGaA, Frankfurter Str. 250, D-64293 Darmstadt, Germany.

www.chemdata.de/

Sigma-Aldrich, 3050 Spruce Street, St. Louis Missouri 63103, USA

11.11.2003

1.1.2 SPECTRA

1. General Information

ld 298-06-6 **Date** 26.11.2003

1.2	SYNONYMS AND TRADENAMES
Dit	niophosphoric acid O,O-diethyl ester
11.	11.2003
13.	11.2003
1.3	IMPURITIES
1.4	ADDITIVES
1.5	TOTAL QUANTITY
1.6.1	LABELLING
1.6.2	CLASSIFICATION
1.6.3	PACKAGING
1.7	USE PATTERN
1.7.1	DETAILED USE PATTERN
1.7.2	METHODS OF MANUFACTURE
1.8	REGULATORY MEASURES
1.8.1	OCCUPATIONAL EXPOSURE LIMIT VALUES
192	ACCEPTABLE RESIDUES LEVELS
1.0.2	ACCLITABLE NEGIDULG ELVELG
1.8.3	WATER POLLUTION
1.8.4	MAJOR ACCIDENT HAZARDS

1. General Information

Id 298-06-6 **Date** 26.11.2003

1.8.5 AIR POLLUTION

1.8.6 LISTINGS E.G. CHEMICAL INVENTORIES

1.9.1 DEGRADATION/TRANSFORMATION PRODUCTS

1.9.2 COMPONENTS

1.10 SOURCE OF EXPOSURE

1.11 ADDITIONAL REMARKS

1.12 LAST LITERATURE SEARCH

Type of search : Internal and External Chapters covered : 3, 4, 5
Date of search : 01.07.2003

26.11.2003

1.13 REVIEWS

ld 298-06-6 **Date** 26.11.2003

2.1 MELTING POINT

Method : other Year :

GLP : no

Test substance : as prescribed by 1.1 - 1.4

Remark : Not applicable; substance is a liquid at ambient temperature

Flag : Critical study for SIDS endpoint

11.11.2003

2.2 BOILING POINT

Value : 105 - 108 °C at 20 hPa

Decomposition

Method : other: no data

Year

GLP : no data

Test substance : as prescribed by 1.1 - 1.4

Flag : Critical study for SIDS endpoint

11.11.2003 (1)

Decomposition: yes

Method : other: no data

Year

GLP : no data

Test substance : as prescribed by 1.1 - 1.4

Remark : Decomposition at temperatures > 150 degree C

11.11.2003 (1)

2.3 DENSITY

Type : density

Value : 1.17 g/cm3 at 20 °C Method : other: no data

Year

GLP : no data

Test substance : as prescribed by 1.1 - 1.4

Flag : Critical study for SIDS endpoint

11.11.2003 (1)

Type : relative density

Value : 1.111 Method : other: no data

Year

GLP : no data

Test substance: as prescribed by 1.1 - 1.4

11.11.2003 (2)

ld 298-06-6 **Date** 26.11.2003

2.3.1 GRANULOMETRY

2.4 VAPOUR PRESSURE

Value : .077 hPa at °C

Decomposition

Method : other (calculated): MPBPWIN (v1.41)

Year

GLP : no

Test substance: other TS: molecular structure

Result: Vapor Pressure Estimations (25 deg C):

(Using BP: 235.63 deg C (estimated))

(MP not used for liquids)

VP: 0.0611 mm Hg (Antoine Method)
VP: 0.0554 mm Hg (Modified Grain Method)
VP: 0.0957 mm Hg (Mackay Method)

Selected VP: 0.0583 mm Hg (Mean of Antoine & Grain methods)

Reliability : (2) valid with restrictions

Accepted calculation method

Flag : Critical study for SIDS endpoint

08.10.2003 (3)

2.5 PARTITION COEFFICIENT

Partition coefficient

Log pow : 1.17 at 25°C Method : other (calculated)

Year :

GLP : no

Test substance : other TS: molecular structure

Reliability : (2) valid with restrictions

Accepted calculation method

Flag : Critical study for SIDS endpoint

28.10.2003 (4)

Partition coefficient

Log pow : at 23 °C Method : other (measured)

Year

GLP : no

Test substance : other TS: diethylphosphorodithioic acid; purity not noted

Method: The solvent distribution of diethylphosphorodithioic acid was investigated at

room temperature (22-23 degree C) by using 100 ml separation funnels: 10 ml of aqueous solution of 1 M ionic strength were shaken with 10 ml of organic solvent (butanol or benzene) containing known amounts of test

substance. After 20 minutes the phases were separated.

The concentration of test substance was determined by iodometric titration or potentiation titration with AgNO3. The volume changes caused by reciprocal solubility in the water-benzene can be neglected. For the water-

butanol system, volume corrections were made.

Result : pH50 logP pKa

water/benzene system: 0.30 0.37 -0.07 water/n-butanol system: 0.70 0.55 0.15

28.10.2003 (5)

Id 298-06-6 **Date** 26.11.2003

: octanol-water Partition coefficient : 2.24 at 25 °C Log pow

Method : other (calculated): KOWWIN Program (v1.65)

Year

GLP

Test substance : other TS: molecular structure

Result : SMILES: O(P(OCC)(S)=S)CC

CHEM: Phosphorodithioic acid, O,O-diethyl ester

MOL FOR: C4 H11 O2 P1 S2

MOL WT: 186.23

----- + ----- +------TYPE | NUM | LOGKOW FRAGMENT DESCRIPTION | COEFF | VALUE ----- + ----- + ------

 Frag | 2 | -CH3 [aliphatic carbon]
 | 0.5473 | 1.0946

 Frag | 2 | -CH2- [aliphatic carbon]
 | 0.4911 | 0.9822

 Frag | 1 | S=P [thio=phosphorus]
 | -0.6587 | -0.6587

 Frag | 2 | -O-P [aliphatic attach]
 | -0.0162 | -0.0324

 Frag | 1 | -S-P [sulfur, phosphorus attach]
 | 0.6270 | 0.6270

 Const | | Fguation Constant
 | 0.2290

 Const | | Equation Constant | | 0.2290

Log Kow = 2.2417

Reliability : (2) valid with restrictions

Accepted calculation method

28.10.2003 (3)

2.6.1 SOLUBILITY IN DIFFERENT MEDIA

Solubility in : Water Description not soluble

Stable

Deg. product

Method : other: no data

Year

GLP : no data

Test substance : as prescribed by 1.1 - 1.4

11.11.2003 (1)

2.6.2 SURFACE TENSION

2.7 FLASH POINT

2.8 AUTO FLAMMABILITY

2.9 FLAMMABILITY

2.10 EXPLOSIVE PROPERTIES

ld 298-06-6 **Date** 26.11.2003

2.11 OXIDIZING PROPERTIES

2.12 DISSOCIATION CONSTANT

Method : other Year :

GLP : no

Test substance : other TS: diethylphosphorodithioic acid; purity not noted

Method : The solvent distribution of diethylphosphorodithioic acid was investigated at

room temperature (22-23 degree C) by using 100 ml separation funnels: 10 ml of aqueous solution of 1 M ionic strength were shaken with 10 ml of organic solvent (butanol or benzene) containing known amounts of test

substance. After 20 minutes the phases were separated.

The concentration of test substance was determined by iodometric titration or potentiation titration with AgNO3. The volume changes caused by reciprocal solubility in the water-benzene can be neglected. For the water-

butanol system, volume corrections were made.

Result : pH50 logP pKa

water/benzene system: 0.30 0.37 -0.07 water/n-butanol system: 0.70 0.55 0.15

28.10.2003 (5)

2.13 VISCOSITY

2.14 ADDITIONAL REMARKS

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3.1.1 PHOTODEGRADATION

Type : air INDIRECT PHOTOLYSIS

Sensitizer : OH

Conc. of sensitizer : 1500000 molecule/cm3

Rate constant : .0000000000916 cm³/(molecule*sec)

Degradation : 50 % after 1.4 hour(s)

Deg. product :

Method : other (calculated): AOP Program (v1.91

Year

GLP : no

Test substance : other TS: molecular structure

Remark : The U.S. EPA uses a 12-hr day because OH radicals exist only during

sunlight hours...the 12-hr period is an average daylight time for a whole year. The U.S. EPA uses an OH concentration of 1.5E6 which is an

average concentration for daylight hours only

Reliability : (2) valid with restrictions

Accepted calculation method

Flag : Critical study for SIDS endpoint

08.10.2003 (3)

3.1.2 STABILITY IN WATER

Type : abiotic GLP : no data

Test substance : other TS: diethyl dithiophosphate; BDH quality

Method : "Allen's" modified method of colorimetry, in aqueous solutions from 0.1 to

7.0 mol/dm3 HCL at 98 degree C.

Remark : Diethyl dithiophosphate in acid media occurs as both conjugate acid

species and neutral species. Comparative data support the bimolecular nature of hydrolysis involving attack of water molecule on phosphorus of

the diester involving P-O bond fission.

Result : Experimental and Estimated data for the hydrolysis of diethyl

dithiophosphate at 98 degree C

HCL (mol/dm3)	Ke x 10e4 (min-1)	Ke x 10e4 (min-1)
	(experimental)	(estimated)
0.1	11.32	12.68
0.2	12.74	12.87
0.5	13.02	13.45
1.0	13.75	14.44
2.0	16.86	16.58
3.0	18.14	18.91
4.0	22.22	21.45
5.0	16.44	16.51
6.0	15.16	14.60

Reliability : (2) valid with restrictions

Meets generally accepted scientific standards, well documented and

13.22

13.75

acceptable for assessment.

Flag : Critical study for SIDS endpoint

7.0

28.10.2003 (6)

ld 298-06-6 **Date** 26.11.2003

3.1.3 STABILITY IN SOIL

3.2.1 MONITORING DATA

3.2.2 FIELD STUDIES

3.3.1 TRANSPORT BETWEEN ENVIRONMENTAL COMPARTMENTS

Type : fugacity model level III

Method : other: EPIWIN modelling program

Year

Remark : Modeling was performed using equal releases (1,000 kg/hr) and equal

distribution to all compartments.

Result : Level III Fugacity Model (Full-Output):

Chem Name : Phosphorodithioic acid, O,O-diethyl ester

Molecular Wt: 186.23

Henry's LC : 0.000371 atm-m3/mole (Henrywin program)

Vapor Press: 0.0583 mm Hg (Mpbpwin program)

Log Kow : 2.24 (Kowwin program) Soil Koc : 71.2 (calc by model)

	Mass Amount	Half-Life	Emissions
	(percent)	(hr)	(kg/hr)
Air	1.06	2.8	1000
Water	39.5	360	1000
Soil	59.3	360	1000
Sediment	0.152	1.44e+003	0

	Fugacity	Reaction	Advection	Reaction	Advection
	(atm)	(kg/hr)	(kg/hr)	(percent)	(percent)
Air	8.3e-012	1.57e+0	03 63.3	52.2	2.11
Water	2.35e-009	9 454	236	15.1	7.86
Soil	1.95e-008	8 681	0	22.7	0
Sediment	1.67e-009	0.437	0.0182	0.0146	0.000605

Persistence Time: 199 hr
Reaction Time: 221 hr
Advection Time: 2e+003 hr
Percent Reacted: 90
Percent Advected: 9.97
: (2) valid with restrictions

Accepted calculation method

Flag : Critical study for SIDS endpoint

11.11.2003

3.3.2 DISTRIBUTION

Reliability

3.4 MODE OF DEGRADATION IN ACTUAL USE

ld 298-06-6 **Date** 26.11.2003

3.5 BIODEGRADATION

Type : aerobic

Result : inherently biodegradable

Deg. product

Method : other: BIOWIN (v4.01)

Year :

GLP : no

Test substance : other TS: molecular structure

Result : ------ BIOWIN v4.01 Results-----

Linear Model Prediction : Biodegrades Fast Non-Linear Model Prediction: Biodegrades Fast Ultimate Biodegradation Timeframe: Weeks Primary Biodegradation Timeframe: Days-Weeks

MITI Linear Model Prediction : Does Not Biodegrade Fast MITI Non-Linear Model Prediction: Does Not Biodegrade Fast

+++	+
TYPE NUM BIOWIN FRAGMENT DESCRIPTION COEFF	
MolWt * Molecular Weight Parameter Const * Equation Constant	-0.0887 0.7475
RESULT LINEAR BIODEGRADATION PROBABILITY	0.6589
TYPE NUM BIOWIN FRAGMENT DESCRIPTION COEFF	VALUE
MolWt * Molecular Weight Parameter	-2.6444
RESULT NON-LINEAR BIODEGRADATION PROBABILITY	0.5901

A Proba	ability Greater	Than or Equa	I to 0.5 indicat	tes> Bioded	rades Fast
---------	-----------------	--------------	------------------	-------------	------------

+
OEFF VALUE
+
-0.4115
3.1992
=====+======
ATION 2.7876

====+=====	 	:=====+=====	==+=====

TYPE NUM BIOWIN FRAGMENT DESCRIPTION	•
MolWt * Molecular Weight Parameter Const * Equation Constant	+ -0.2687 3.8477
RESULT SURVEY MODEL - PRIMARY BIODEGRAD	ATION 3.5791

Result Classification: 5.00 -> hours 4.00 -> days 3.00 -> weeks

2.00 -> months 1.00 -> longer (Primary & Ultimate)

Reliability : (2) valid with restrictions

Accepted calculation method

28.10.2003 (3)

Type : aerobic

Inoculum : activated sludge, adapted

ld 298-06-6 **Date** 26.11.2003

Concentration : 500 mg/l related to Test substance

related to

GLP : no data

Test substance : other TS: O,O-dimethyl ammonium phosphorodithioate [DMDTP]

(purchased from Aldrich Chemical Co. Milwaukee, USA) and O,O-diethyl ammonium phosphorodithioate (purchased from Strem Chemicals,

Danvers, USA)

Method: The sludge was activated by a fill-and-draw method in a batch system.

The activated sludge was washed 3 times with tap water and suspended in tap water to a mixed liquor suspended solid concentration of 5000 mg/l. To 1.5 liter of mixed liquor was added 500 mg/l of test substance and cultured with aeration at 30 degree C. The pH of the mixture was maintained at 7.0.

At intervals, 15 ml portions were removed and filtered for analysis.

DMDTP was measured colormetrically at 420 nm. Water-soluble TOC was estimated with a Beckmanm model 102A TOC analyzer. Inorganic orthophosphate was estimated by the colormetric method of molybdenum

blue with the use of stannous chloride as a reducing agent. The

degradation products in th eextracellular solution were separated with thin-

layer chromatography.

Remark : The degradation pathway of DMDTP by activated sludge is DMDTP ->

DMTP -> DMP -> MP -> P.

Result : A drop in pH was observed in mixed liquor duing acclimation and the pH

adjusted to 7.0 whenever the medium was replaced. The activated sludge did not degrade DMDTP to inorganic phosphate for three months.

When the acclimation was carried out using a pH controller to maintain the

pH at 7.0, the DMDTP disappeared after 6 days.

This adapted sludge was able to degrade 500 mg/l of DMDTP in 1 day when the pH range was 5.0 to 7.5. Degradation did not occur at pH lower

than 4.5 or higher than 8.5.

Conclusion : Activated sludge degraded all test substances to inorganic phosphate by

acclimation within 3 weeks.

Reliability : (2) valid with restrictions

Flag : Critical study for SIDS endpoint

11.11.2003 (7)

3.6 BOD5, COD OR BOD5/COD RATIO

3.7 BIOACCUMULATION

Species : other **Exposure period** : at 25 °C

Concentration

BCF : 10.62

Elimination

Method : other: (calculated) BCF Program (v2.15)

Year

GLP : no

Test substance : other TS: molecular structure

Result : ------ Bcfwin v2.15 -----

Log Kow (estimated): 2.24

Log Kow (experimental): not available from database

Log Kow used by BCF estimates: 2.24

Equation Used to Make BCF estimate:

Log BCF = 0.77 log Kow - 0.70 + Correction

ld 298-06-6 **Date** 26.11.2003

Correction(s): No Applicable Correction Factors

Estimated Log BCF = 1.026 (BCF = 10.62)

13.11.2003 (3)

3.8 ADDITIONAL REMARKS

4. Ecotoxicity Id 298-06-6

Pate 26.11.2003

4.1 ACUTE/PROLONGED TOXICITY TO FISH

Type : static

Species : Salmo gairdneri (Fish, estuary, fresh water)

 Exposure period
 : 96 hour(s)

 Unit
 : mg/l

 LC50
 : 310 - 330

Limit test

Analytical monitoring : no data

Method Year

GLP : no

Test substance : other TS: Phosphorodithioic acid, O,O-diethyl ester, sodium salt - Sodium

Aerofloat (commercial product)

Method: Fingerlings from three different egg sources were used. The fingerlings,

ranged in weight 1-10 g were allowed to acclimate for 24 hours. 20 fish were added to each test aquaria. Approximately one hour after the fish were transferred, the sample (previously dissolved in an aliquot of experimental water) was added. Water temperature was maintained at 12 (+/-1) degree C. Median lethal concentrations were determined by plotting

median survival times, LC50, as a function of the logarithm of the

concentration.

Result : LC50 = 400 - 410 ppm at 12 degrees C

LC50 = 310 - 330 ppm at 16 degrees C

Test condition : The experimental water used was naturally hard spring water used in a

trout fish hatchery. The volume of water was adjusted to maintain a ratio of

2g wet fish per liter of water.

pH = 8.6; total hardness = 348 ppm; carbonate hardness = 203 ppm; oxygen saturation was maintained by bubbling air into the water.

Reliability : (2) valid with restrictions

Meets generally accepted scientific standards, well documented and

acceptable for assessment.

Flag : Critical study for SIDS endpoint

26.11.2003 (8)

Type

Species: Poecilia reticulata (Fish, fresh water)

Exposure period : 24 hour(s)
Unit : mg/l
LC50 : 79

Method : other: no data

Year

GLP : no data

Test substance : as prescribed by 1.1 - 1.4

Reliability : (2) valid with restrictions

Data from Handbook or collection of data

Flag : Critical study for SIDS endpoint

26.11.2003 (1)

Type : other: SAR

Species

 Exposure period
 : 96 hour(s)

 Unit
 : mg/l

 LC50
 : 10.982

Method : other: ECOSAR Program (v0.99g)

Year

GLP : no

4. Ecotoxicity

Id 298-06-6 **Date** 26.11.2003

Test substance : other TS: molecular structure

Remark : ECOSAR Class: Esters (phosphate)

Reliability : (2) valid with restrictions

Accepted calculation method

26.11.2003 (3)

4.2 ACUTE TOXICITY TO AQUATIC INVERTEBRATES

Type

Species Daphnia magna (Crustacea)

Exposure period 24 hour(s) Unit mg/l **EC50** .54 **Analytical monitoring** no data

Method OECD Guide-line 202

Year

GLP : no data

Test substance : other TS: diethyldithiophosphate; purity = 90%; obtained from Aldrich,

Germany

Reliability : (2) valid with restrictions

Guideline study

: Critical study for SIDS endpoint Flag

07.10.2003 (9)

4.3 **TOXICITY TO AQUATIC PLANTS E.G. ALGAE**

4.4 TOXICITY TO MICROORGANISMS E.G. BACTERIA

Type aquatic

Species Photobacterium phosphoreum (Bacteria)

Exposure period 30 minute(s) Unit mg/l

EC10 3.13 -**Analytical monitoring** no data

Method other: Microtox assay

Year

GLP

Test substance other TS: diethyldithiophosphate; purity = 90%; obtained from Aldrich,

Germany

Test condition The inhibition of bioluminescence was measured according to Beckman

Microtox system operating manual (1982) in a saline solution (2% NaCl in water) at a temperature of 15 degrees C, after a 30 minute incubation.

07.10.2003 (9)

4.5.1 CHRONIC TOXICITY TO FISH

4.5.2 CHRONIC TOXICITY TO AQUATIC INVERTEBRATES

4. Ecotoxicity Id 298-06-6 Date 26.11.2003 4.6.1 TOXICITY TO SEDIMENT DWELLING ORGANISMS 4.6.2 TOXICITY TO TERRESTRIAL PLANTS 4.6.3 TOXICITY TO SOIL DWELLING ORGANISMS 4.6.4 TOX. TO OTHER NON MAMM. TERR. SPECIES 4.7 BIOLOGICAL EFFECTS MONITORING 4.8 BIOTRANSFORMATION AND KINETICS

4.9 ADDITIONAL REMARKS

Id 298-06-6 5. Toxicity Date 26.11.2003

TOXICOKINETICS, METABOLISM AND DISTRIBUTION 5.0

5.1.1 ACUTE ORAL TOXICITY

Type LD50

Value 4510 mg/kg bw

Species rat

Strain

Sex

Number of animals

Vehicle

Doses

Method

Year

GLP

Test substance : other TS: Phosphorodithioic acid, O,O-diethyl ester; purity not noted

Reliability : (2) valid with restrictions

Data from Handbook or collection of data

: Critical study for SIDS endpoint Flag

13.11.2003 (10)

5.1.2 ACUTE INHALATION TOXICITY

LC50 Type

Value 1640 mg/m3

Species rat

Strain

Sex

Number of animals

Vehicle

Doses

Exposure time 4 hour(s)

other: no data Method

Year

GLP : no data

Test substance other TS: Phosphorodithioic acid, O,O-diethyl ester; purity not noted

: TOXIC EFFECTS: Remark

Behavioral - Somnolence (general depressed activity)

Lung, Thorax, or Respiration - Dyspnea

Nutritional and Gross Metabolic - Weight loss or decreased weight gain

: (2) valid with restrictions Reliability

Data from Handbook or collection of data

: Critical study for SIDS endpoint Flag

13.11.2003 (11)

5.1.3 ACUTE DERMAL TOXICITY

Type : LD50

Value : > 2000 mg/kg bw

Species : rabbit

Strain : New Zealand white Sex : male/female

Id 298-06-6 5. Toxicity **Date** 26.11.2003

: 4 Number of animals Vehicle water

Doses 2000 mg/kg bw

Method OECD Guide-line 402 "Acute dermal Toxicity"

Year

GLP

Test substance : other TS: sodium O,O-diethyl phosphorodithionate (CAS# 3338-24-7);

commercial product; purity not indicated

Result # Deaths/# Symptoms/# exposed Sex Dose

> Male 2000 mg/kg 0/0/2 Female 2000 mg/kg 0/0/2

: (2) valid with restrictions Reliability

> Guideline study with acceptable restrictions; only 2 animals/sex were used in a limit test

: Critical study for SIDS endpoint Flag

07.10.2003 (12)

5.1.4 ACUTE TOXICITY, OTHER ROUTES

5.2.1 SKIN IRRITATION

Species rabbit Concentration 500 mg Occlusive **Exposure** Exposure time 24 hour(s)

Number of animals

Vehicle **PDII**

slightly irritating Result

Classification

Method **Draize Test**

Year

GLP no data

Test substance other TS: Phosphorodithioic acid, O,O-diethyl ester; purity not noted

Reliability (2) valid with restrictions

Data from Handbook or collection of data

13.11.2003 (10)

5.2.2 EYE IRRITATION

Species rabbit Concentration .1 mg

Dose

Exposure time 24 hour(s)

Comment

Number of animals

Vehicle

Result highly irritating

Classification

Method

Year

GLP

Test substance other TS: Phosphorodithioic acid, O,O-diethyl ester; purity not noted

Reliability : (2) valid with restrictions

5. Toxicity Id 298-06-6

Pate 26.11.2003

Data from Handbook or collection of data

13.11.2003 (10)

5.3 SENSITIZATION

5.4 REPEATED DOSE TOXICITY

5.5 GENETIC TOXICITY 'IN VITRO'

Type : Ames test

System of testing : Salmonella typhimurium TA1538, TA98, TA1535, TA100, TA1537

Test concentration
Cycotoxic concentr.

Metabolic activation: with and without

Result : negative

Method : OECD Guide-line 471

Year :

GLP : no data

Test substance : other TS: O,O-diethyldithiophosphate; purity not noted

Remark : Bacterial strains were received from Professor B.N. Ames, University of

California, US.

Reliability : (2) valid with restrictions

Meets generally accepted scientific standards

Flag : Critical study for SIDS endpoint

13.11.2003 (13)

5.6 GENETIC TOXICITY 'IN VIVO'

5.7 CARCINOGENICITY

5.8.1 TOXICITY TO FERTILITY

5.8.2 DEVELOPMENTAL TOXICITY/TERATOGENICITY

5.8.3 TOXICITY TO REPRODUCTION, OTHER STUDIES

Type : other: inhibition of acetylcholinesterase

In vitro/in vivo : In vitro

Result : > 1000 mg/l of dithiophosphate was needed for complete inhibition of

AChE

Method

Year

GLP : no data

Test substance : other TS: diethyldithiophosphate; purity = 90%; obtained from Aldrich,

Germany

5. Toxicity Id 298-06-6
Date 26.11.2003

Method

: To 1.0 ml of enzyme solution (containing 15 ug horse blood serum in 70 mM phosphate buffer pH 6.5) 1.0 ml of varying aqueous dilutions of insecticide solution was added, mixed, and incubated for 5 minutes at 20 degree C. After addition of 0.5 ml substrate solution (containing 4.0 mg butyrylthiocholin iodide in 70 mM phosphate buffer pH 6.5) the mixture was incubated for 5 minutes at 37 degree C in a water bath. Then 1.0 ml staining solution (containing 0.1 mg dichlorophenolindophenol in 70 mM phosphate buffer pH 6.5) was added and incubated at 37 degree C. After 5 minutes, the color was assessed visually - a dark blue color indicates total inhibition of AChE.

07.10.2003 (9)

5.9 SPECIFIC INVESTIGATIONS

5.10 EXPOSURE EXPERIENCE

5.11 ADDITIONAL REMARKS

6. Analyt. Meth. for Detection and Identification	ld 298-06-6 Date 26.11.2003
6.1 ANALYTICAL METHODS	
6.2 DETECTION AND IDENTIFICATION	
21 / 25	

7. Eff	f. Against Target Org. and Intended Uses	298-06-6 26.11.2003	
7.1	FUNCTION		
	T GNG TIGH		
7.2	EFFECTS ON ORGANISMS TO BE CONTROLLED		
7.3	ORGANISMS TO BE PROTECTED		
7.4	USER		
7.5	RESISTANCE		

Id 298-06-6 8. Meas. Nec. to Prot. Man, Animals, Environment **Date** 26.11.2003 8.1 METHODS HANDLING AND STORING 8.2 FIRE GUIDANCE 8.3 EMERGENCY MEASURES 8.4 POSSIB. OF RENDERING SUBST. HARMLESS 8.5 WASTE MANAGEMENT 8.6 SIDE-EFFECTS DETECTION 8.7 SUBSTANCE REGISTERED AS DANGEROUS FOR GROUND WATER 8.8 REACTIVITY TOWARDS CONTAINER MATERIAL

9. References Id 298-06-6 Pate 26.11.2003

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10. Summary and Evaluation **Id** 298-06-6 **Date** 26.11.2003 10.1 END POINT SUMMARY 10.2 HAZARD SUMMARY 10.3 RISK ASSESSMENT